

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

CROWN CCI, LLC
NOTICE OF MOTION AND HEARING

Crown CCI, LLC (“Crown”), by its counsel, has filed papers with the Court requesting the Court to enter an Order Compelling Payment of Post-Petition Rent and Post-Petition Taxes Pursuant to 11 U.S.C. § 365(d)(3).¹

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). Under Local Bankruptcy Rule 4001-(a)-1, the Court may deem any opposition waived, treat the Motion as conceded, and issue an Order granting the requested relief without further notice or hearing unless you take the following steps:

File with the Court, at the address shown below, a written objection. If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before December 3, 2008 at 4:00 p.m.

William C. Redden, Clerk
United States Bankruptcy Court
701 E. Broad Street
Room 4000
Richmond, Virginia 23219

Paul S. Bliley, Jr., VSB # 13973
WILLIAMS MULLEN
P.O. Box 1320
Richmond, VA 23218-1320
Phone: (804) 783-6448
Fax: (804) 783-6507
pbbliley@williamsmullen.com

Mail a copy of your response and supporting memorandum to:

Paul S. Biley, Jr., Esquire
Williams Mullen
P.O. Box 1320
Richmond, VA 23218-1320

Your or your attorney also must:

Attend a hearing on the Motion scheduled to be held on December 5, 2008 at 10:00 a.m. at the United States Bankruptcy Court, United States Courthouse, 701 East Broad Street, Room 4000, Richmond, Virginia 23219

If you or your attorney do not take these steps, including the filing and serving of a written response and supporting memorandum within the time period and in the manner set forth above pursuant to Local Bankruptcy Rule 9013-1, the court may deem any opposition waived, treat the Motion as conceded, decide that you do not oppose the Motion and issue an order granting the relief requested without further notice or hearing.

Dated: November 21, 2008 CROWN CCI, LLC

By /s/ Paul S. Biley, Jr.
Of Counsel

Paul S. Biley, Jr., VSB # 13973
WILLIAMS MULLEN
P.O. Box 1320
Richmond, VA 23218-1320
Phone: (804) 783-6448
Fax: (804) 783-6507
pbiley@williamsmullen.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 21st day of November, 2008, a copy of the **Notice of Motion and Hearing** and the **Motion of Burbank Mall Associates, LLC for entry of an Order Compelling Payment of Post-Petition Rent Pursuant to 11 U.S.C. § 365(d)(3)** were via the Electronic Case Filing (ECF) system, as appropriate, and by First Class Mail (postage prepaid) on the following attached Service List:

/s/ Paul S. Bliley, Jr.

1685241v1

Service List

Scott L. Adkins
Phillips, Goldman & Spence
1200 North Broom Street
Wilmington, DE 19806

Peter Barrett
Kutak Rock L.L.P.
1111 East Main Street, Suite 800
Richmond, VA 23219-3500

Christopher R. Belmonte
Satterlee Stephens Burke & Burke LLP
230 Park Ave Suite 1130
New York, NY 10169

Sarah Beckett Boehm
McGuireWoods LLP
One James Center
901 East Cary St.
Richmond, VA 23219

Mark E. Browning
Office of the Attorney General
300 West 15th Street, 8th floor
Austin, TX 78701

William H. Casterline, Jr.
Blankingship & Keith, P.C.
4020 University Drive, #312
Fairfax, VA 22030

Andrew S. Conway
The Taubman Company
200 East Long Lake Road
Suite 300
Bloomfield Hills, MI 48304

Jennifer V. Doran
Hinckley Allen & Snyder LLP
28 State Street
Boston, MA 02109

David J. Ervin
Kelley, Drye & Warren, LLP
Washington Harbour, Suite 400
3050 K Street N.W.
Washington, DC 20007-5108

Jeremy S. Friedberg
Leitess Leitess Friedberg + Fedder PC
One Corporate Center
10451 Mill Run Circle, Suite 1000
Owings Mills, MD 21117

Mark K. Ames
Taxing Authority Consulting Services
2812 Emerywood Parkway, Suite 220
Richmond, VA 23294

Raymond William Battaglia
Oppenheimer, Blend, Harrison & Tate, Inc
711 Navarro Sixth Floor
San Antonio, TX 78205

David S. Berman
Riener & Braunstein
Three Center Plaza, 6th Floor
Boston, MA 02108

Wanda Borges
Borges & Associates, LLC
575 Underhill Blvd.
Syosset, NY 11791

Christopher A. Camardello
Winthrop & Weinstine, PA
225 South Sixth Street
Suite 3500
Minneapolis, MN 55402

Jeffrey Chang
Wildman, Harrold, Allen & Dixon
225 West Wacker Drive
Chicago, IL 60606-1229

Robert K. Coulter
Office of the US Attorney
2100 Jamieson Avenue
Alexandria, VA 22314

Bradford F. Englander
Linowes and Blocher LLP
7200 Wisconsin Avenue, Suite 800
Bethesda, MD 20814

William J. Factor
Seyfarth Shaw LLP
131 S. Dearborn St. Suite 2400
Chicago, IL 60603

Ellen A. Friedman
Friedman Dumas & Springwater LLP
160 Spear Street, Suite 1600
San Francisco, CA 94105

Elizabeth Banda
Perdue, Brandon, Fielder, Collins & Mott
4025 Woodland Park Blvd Suite 300
Arlington, TX 76013

Andria M. Beckham
Bricker & Eckler, LLP
100 South Third Street
Columbus, OH 43215

Daniel F. Blanks
McGuireWoods LLP
9000 World Trade Center, 101 W.
Main St.
Norfolk, VA 23510

Timothy Francis Brown
Arent Fox LLP
1050 Connecticut Ave. N.W.
Washington, DC 20036-5339

Scott P. Carroll
Carroll & Carroll, P.L.L.C.
Suite 440
831 East Morehead Street
Charlotte, NC 28202

Charles W. Chotvacs
Ballard, Spahr, Andrews & Ingersoll, LLP
601 13th St. N.W. Suite 1000 South
Washington, DC 20005

Heather D. Dawson
Kitchens Kelley Gaynes, PC
Eleven Piedmont Center, Suite 900
3495 Piedmont Rd, NE
Atlanta, GA 30305

Augustus C. Epps, Jr.
Christian & Barton, L.L.P.
909 E. Main St., Suite 1200
Richmond, VA 23219-3095

Douglas M. Foley
McGuireWoods LLP
9000 World Trade Center, 101 W.
Main St.
Norfolk, VA 23510

Laura Lawton Gee
Baker & Hostetler, LLP
1000 Louisiana Street
Suite 2000
Houston, TX 77002

Service List

Eric D. Goldberg
Stutman, Treister & Glatt, P.C.
1901 Ave of the Stars-12th Floor
Los Angeles, CA 90067

David A. Greer
Law Offices of David A. Greer PLC
500 East Main Street Ste 1200
Norfolk, VA 23510

Eric A. Handler
Donahue Gallagher Woods LLP
300 Lakeside Drive, Suite 1900
Oakland, CA 94612

Brian D. Huben
Katten Muchin Rosenman LLP
2029 Century Park East
Suite 2600
Los Angeles, CA 90067-6042

Scott R. Kipnis
Hofheimer Gartlis & Gross LLP
530 Fifth Ave.
New York, NY 10036

Darryl S. Laddin
Arnall Golden Gregory LLP
171 17th St. N.W. Suite 2100
Atlanta, GA 30363-1031

James V. Lombardi
Ross, Banks, May Cron & Cavin, P.C.
2 Riverway, Suite 700
Houston, TX 77056

Christine D. Lynch
Goulston & Storrs, P.C.
400 Atlantic Avenue
Boston, MA 02110-3333

Bruce H. Matson
LeClair Ryan, A Professional Corporation
Riverfront Plaza, East Tower
951 East Byrd Street
P.O. Box 2499
Richmond, VA 23218-2499

Jennifer McLain McLemore
Christian & Barton, LLP
909 East Main Street, Suite 1200
Richmond, VA 23219

William A. Gray
Sands Anderson Marks & Miller
P.O. Box 1998
Richmond, VA 23218-1998

Elizabeth L. Gunn
DurretteBradshaw, PLC
600 East Main Street, 20th Floor
Richmond, VA 23219

Dion W. Hayes
McGuireWoods LLP
One James Center, 901 E. Cary St.
Richmond, VA 23219

Kenneth C. Johnson
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215

Leonidas Koutsouftikis
Magruder & Associates
1889 Preston White Drive
Suite 200
Reston, VA 20191

John J. Lamoureux
Carlton Fields, P.A.
P.O. Box 3239
Tampa, FL 33601-3239

Henry Pollard Long, III
Hunton & Williams, LLP
951 East Byrd Street
Riverfront Plaza East Tower
Richmond, VA 23219-4074

Michael W. Malter
Binder & Malter
2775 Park Ave.
Santa Clara, CA 95050

Robert P. McIntosh
U.S. Attorney's Office
600 East Main St., Suite 1800
Richmond, VA 23219

Jeffrey Meyers
Ballard Spahr Andrews & Ingersoll
51st Fl- Mellon Bank Center
1735 Market Street
Philadelphia, PA 19103

Steven H. Greenfeld
Cohen Baldinger & Greenfeld, LLC
7910 Woodmont Avenue
Suite 760
Bethesda, MD 20814

Brian P. Hall
Smith, Gambrell & Russell, LLP
Suite 3100, Promenade II
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592

Neil E. Herman
Morgan, Lewis & Bockius, LLP
101 Park Ave.
New York, NY 10178-0600

Regina Stango Kelbon
Blank Rome LLP
One Logan Square
Philadelphia, PA 19103

Jeffrey Kurtzman
Klehr, Harrison, Harvey, Branzburg & Ell
260 South Broad Street
Philadelphia, PA 19102-5003

Richard E. Lear
Holland & Knight LLP
2099 Pennsylvania Ave., NW #100
Washington, DC 20006

John E. Lucian
Blank Rome LLP
One Logan Square
130 N. 18th St
Philadelphia, PA 19103-6998

Richard M. Maseles
Missouri Department of Revenue
301 W. High St.
P.O. Box 475
Jefferson City, MO 65102

John G. McJunkin
McKenna Long & Aldridge LLP
1900 K Street, NW
Washington, DC 20006

Michael D. Mueller
Christian & Barton, L.L.P.
909 East Main St., Ste. 1200
Richmond, VA 23219

Service List

Kevin M. Newman
Menter, Rudin & Trivelpiece, P.C.
308 Maltbie Street, Suite 200
Syracuse, NY 13204-1498

Min Park
Connolly Bove Lodge & Hutz LLP
1875 Eye street, Suite #1100
Washington, DC 20006

Courtney E. Pozmantier
Klee, Tuchin, Bogdanoff & Stern LLP
1999 Avenue of the Stars
39th Floor
Los Angeles, CA 90067

Fred B. Ringel
Robinson Brog Leinwand Greene, et al.
1345 Avenue of the Americas
31st Floor
New York, NY 10105

Jeremy Brian Root
Blankingship & Keith, P.C.
4020 University Dr. Ste. 300
Fairfax, VA 22030

Jeremy W. Ryan
Saul Ewing LLP
222 Delaware Avenue
P.O. Box 1266
Wilmington, DE 19801

Scott A. Semenek
Wildman, Harrold, Allen & Dixon
225 West Wacker Drive
Chicago, IL 60606-1229

Jesse Silverman
Ballard Spahr Andrews & Ingersoll, LLP
1735 Market Street, 51st Floor
Philadelphia, PA 19103

Scott A. Stengel
Orrick, Herrington & Sutliffe, LLP
Columbia Center
1152 15th Street, NW
Washington, DC 20005-1706

Roy M. Terry, Jr.
DurretteBradshaw, PLC
600 E. Main St., 20th Fl.
Richmond, VA 23219

Constantinos G. Panagopoulos
Ballard Spahr Andrews & Ingersoll, LLP
601 13th Street, NW
Suite 1000 South
Washington, DC 20005-3807

David M. Poitras
Jeffer, Mangels, Butler & Marmaro LLP
1900 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067

Michael Reed
McCreary, Veselka, Bragg & Allen
700 Jeffrey Way, Suite 100
Round Rock, TX 78680

Philip M. Roberts
Berkeley & Degaetani
1301 N. Hamilton St., #200
Richmond, VA 23220

Paul Rubin
Herrick, Feinstein LLP
Two Park Avenue
New York, NY 10016

Michael J. Sage
O'Melveny & Myers LLP
7 Times Square
Times Square Towers
New York, NY 10036

John L. Senica
Miller, Canfield, Paddock and Stone, PLC
225 W. Washington, Suite 2600
Chicago, IL 60606

Stephen W. Spence
Phillips, Goldman & Spence
1200 North Broom Street
Wilmington, DE 19806

Mark Stromberg
Stromberg & Associates, PC
Two Lincoln Centre
5420 LBJ Freeway, Suite 300
Dallas, TX 75240

Dylan G. Trache
Wiley Rein LLP
7925 Jones Branch Drive
Suite 6200
McLean, VA 22102

Ernie Zachary Park
Bewley, Lassleben & Miller, LLP
13215 E. Penn Street, Suite 510
Whittier, CA 90602-1797

David L. Pollack
Ballard Spahr Andrews & Ingersoll LLP
51st Fl-Mellon Bank Center
1735 Market Street
Philadelphia, PA 19103

David G. Reynolds
Glass & Reynolds
P.O. Box 1700
Corrales, NM 87048

Julie H. Rome-Banks
Binder & Malter, LLP
2775 Park Avenue
Santa Clara, CA 95050

Eric Christopher Rusnak
K&L Gates LLP
1601 K Street N.W.
Washington, DC 20006

Jeffrey Scharf
Taxing Authority Consulting Services, PC
2812 Emerywood Parkway
Suite 220
Richmond, VA 23294

Joseph S. Sheerin
McGuire Woods LLP
One James Center
901 East Cary Street
Richmond, VA 23219

Richard F. Stein
Special Assis. U. S. Attorney
600 East Main Street, Ste 1601
Richmond, VA 23219-2430

Jeffrey L. Tarkenton
Womble Carlyle Sandridge & Rice, PLLC
1401 Eye Street, N.W.,
Seventh Floor
Washington, DC 20005

Ronald M. Tucker
Simon Property Group
225 W. Washington Street
Indianapolis, IN 46204

Service List

Robert B. Van Arsdale
Office of the U. S. Trustee
701 East Broad Street, Suite 4304
Richmond, VA 23219

Elizabeth Weller
Linebarger Goggan Blair & Sampson, LLP
2323 Bryan Street, Suite 1600
Dallas, TX 75201

J. Christian Word
Latham & Watkins LLP
11955 Freedom Drive, Suite 500
Reston, VA 20190-5651

Nancy A. Washington
Saiber LLC
One Gateway Center 13th Floor
Newark, NJ 07102

Robert S. Westermann
Hunton & Williams LLP
951 East Byrd Street
Richmond, VA 23219

Jonathan W. Young
Wildman, Harrold, Allen & Dixon
225 West Wacker Drive
Chicago, IL 60606-1229

Mitchell B. Weitzman
Bean, Kinney & Korman, P.C.
2300 Wilson Blvd., 7th Floor
Arlington, VA 22201

Lori L. Winkelman
Quarles & Brady LLP
2 North Central Avenue
Phoenix, AZ 85004-2391

Sheila G. deLa Cruz
Hirschler Fleischer, P.C.
P.O. Box 500
Richmond, VA 23218-0500